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CITY OF GONZALES, OFFICER LOMBARDI, OFFICER C. AYALA,
SERGEANT K. WISE, and OFFICER SIBAYAN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

12 HENRY MEZA, an individual, and) Case No. C-06-03745 JF (HRL)
13 JUVENTINA RAMIREZ, an individual,)
14 Plaintiff(s),)
15 vs.)
16 CITY OF GONZALES, a municipal) Pretrial Conference: March 8, 2008
17 corporation, OFFICER LOMBARDI, an) Trial: March 14, 2008
18 individual, OFFICER C. AYALA, an) Courtroom 3, 5th Floor
19 individual; OFFICER SERGEANT K.) The Honorable Jeremy Fogel
20 WISE, an individual; OFFICER SIBAYAN,)
an individual; and DOES 1 through 50,)
inclusive)
Defendant(s).)

IT IS HEREBY STIPULATED by and between the parties to this action, through their respective counsel of record, that:

24 (1) The expert designation and disclosure cut-off date, currently set for
25 December 14, 2007, be continued to January 31, 2008;
26 (2) The rebuttal expert date, currently set for December 28, 2007, be continued to
27 February 14, 2008;

(3) The expert discovery cut-off date, currently set for February 14, 2008, is continued to February 22, 2008.

Good cause exists for a continuance of the expert designation date and disclosure of reports in this case based on the following:

Federal Rule of Civil Procedure 26(a)(2)(B) and Rule 26 (a)(4)(A) provide that the parties may stipulate to reschedule the expert discovery cut off, and expert depositions must be taken after disclosure of expert reports. Health care providers that have rendered opinions relative to this matter will need to be deposed before the various experts in this case can prepare their reports. Those depositions are not currently scheduled because the parties need to first receive a full and complete copy of the entire medical records from Natividad Hospital which did not provide a complete record. In addition, Defendants' Motion for Summary Judgment will be heard February 8, 2008, and it will be beneficial to the parties to have a determination of that hearing before the expense of expert depositions.

There have been no modifications to the Court's Scheduling Order in this case. Other than continuing the dates that are subject to the stipulation, the requested continuance will have no impact on the schedule for the case.

Dated: January 16, 2008

LAW OFFICES OF VINCENT P. HURLEY
A Professional Corporation

By: /s/ Vincent P. Hurley
VINCENT P. HURLEY
Attorneys for Defendants CITY OF GONZALES,
OFFICER LOMBARDI, OFFICER C. AYALA,
OFFICER SERGEANT K. WISE, and OFFICER
SIBAYAN

Dated: January 16, 2008

SCHAUMAN & HUBINS

By: /s/ William F. Schauman
WILLIAM F. SCHAUMAN
Attorneys for Plaintiffs HENRY MEZA and
JUVENTINA RAMIREZ

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2 IT IS SO ORDERED.
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4 Dated: 1/18/08

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6 The Honorable Jeremy Fogel
7 Judge of the District Court for the
Northern District of California
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